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Attorney for Debtor

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:)	BK-S-13-20220-gs
)	Chapter 11
HERNI THOMPSON)	
)	
)	
)	HEARING DATE: August 30, 2018
Debtor.)	HEARING TIME: 9:30 a.m.

OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW, Debtor, HERNI THOMPSON (“Debtor”), by and through her attorney, COREY B. BECK, ESQ., of THE LAW OFFICE OF COREY B. BECK, P.C., hereby files this Opposition to secured creditor Lakeview Loan Servicing, LLC.,’s Motion for Relief From Automatic Stay as follows:

The “form motion” filed by the creditor leaves out a lot of material facts. Motion to Value was filed with respect to subject property - 2832 Mayfair Avenue, Henderson, NV 89074. An Order was entered on November 19, 2015 - \$175,000.00 value. Undersigned counsel has been following up with Tiffany & Bosco for an extended length of time (over a year) to have Bank accept payments to be tendered electronically.

Undersigned counsel did “meet & confer” with Jason Kolbe, Esq., prior to this motion being filed. It was my understanding that he was not going to file Motion for Relief From Stay. He was to check his internal notes as well as confer with representative of his client.

Undersigned counsel has spoken with Jason Kolbe, Esq., since the filing of the motion. I have requested that a Stipulation for payment incorporate terms set forth in Order on the Motion to Value as well as the Disclosure Statement/Chapter 11 Plan.

1 DATED this 16th day of August, 2018.

2 /s/ COREY B. BECK, ESQ.
3 COREY B. BECK, ESQ.
4 Nevada Bar No. 005870
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CERTIFICATE OF MAILING OF OPPOSITION
TO MOTION FOR RELIEF FROM AUTOMATIC STAY

I hereby certify that on the 16th day of August, 2018, I mailed a true and correct copy of the ***OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY*** email, facsimile, certified and/or first class mail, postage pre-paid, to the following parties of interest, at their last known addresses, as follows:

Jason C. Kolbe, Esq.
TIFFANY & BOSCO, P.A.
10100 W. Charleston Blvd.

SENT VIA YAHOO EMAIL
SENT VIA ECF EMAIL

Suite 220
Las Vegas, NV 89135
Ph.: (702) 258-8200
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nvbk@tblaw.com

Attorney for Lakeview Loan Servicing, LLC
13-78053

/s/ VANESSA ANDERSON
An Employee of
The Law Office of Corey B. Beck, P.C.